

4. American Home obtained a supersedeas bond in the amount of \$8,452,698.74, which, in accordance with Local Civil Rule 62.2, represents the amount of the Judgment (\$7,683,817.04), plus 10 percent (\$768,381.70), plus \$500. This bond was filed with the Clerk's Office on April 25, 2008. A true and accurate copy of such bond, justification of surety, and National Union's Company License issued by the Massachusetts Division of Insurance are attached hereto as Exhibits 1, 2 and 3.

5. Insituform's counsel was provided with a copy of the supersedeas bond prior to American Home's filing of this Motion, and he has reported that Insituform has no objection to the approval of the bond and a stay of execution on the Judgment.

WHEREFORE, for the foregoing reasons, American Home respectfully requests that this Court:

1. Approve the submitted supersedeas bond and stay any execution of the Judgment pending the adjudication of the appeal; and
2. Grant such other further relief the Court deems just and appropriate.

LOCAL RULE 7.1(A) CERTIFICATION

By signing below, the undersigned certifies that counsel for American Home has conferred in good faith with counsel for Plaintiff and that Plaintiff assents to the relief requested in this Motion.

Respectfully submitted,

AMERICAN HOME ASSURANCE COMPANY,

By its attorneys,

/s/ Gregory P. Deschenes
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Dated: April 25, 2008

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon all parties registered for electronic notification via the Court's electronic filing system on April 25, 2008.

/s/ Gregory P. Deschenes
Gregory P. Deschenes